

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INTEGRATED HEALTH SERVICES OF  
CLIFF MANOR, INC., INTEGRATED  
HEALTH SERVICES AT RIVERBEND, INC.  
INTEGRATED HEALTH SERVICES AT  
SOMERSET VALLEY, INC., ALPINE  
MANOR, INC., BRIARCLIFF NURSING  
HOME, INC., INTEGRATED HEALTH  
GROUP, INC., SPRING CREEK OF IHS, INC.,  
FIRELANDS OF IHS, INC., ELM CREEK OF  
IHS, INC., and IHS LONG TERM CARE  
SERVICES, INC.,

Plaintiffs-Counterclaim  
Defendants,

v.

THCI COMPANY LLC,

Defendant,

v.

ABE BRIARWOOD CORPORATION and  
JOHN DOES 1-10,

Additional Counterclaim  
Defendants.

Civil Action No. 04-910 (GMS)

**STIPULATED BRIEFING SCHEDULE**

Plaintiffs and Defendant THCI Company LLC ("THCI") hereby stipulate as follows, subject to approval of the Court:

1. The motions discussed with the Court during the March 29, 2006 teleconference shall be briefed according to the following schedule:

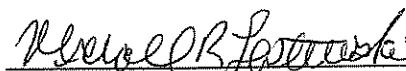
- Plaintiffs' Opening Brief in Support of Their Motion: March 30, 2006

- THCI's Opening Brief in Support of Its Motion: April 3, 2006
- Answering Briefs on both Motions: April 12, 2006
- Reply Briefs on both Motions: April 21, 2006.

2. Plaintiffs withdraw their pending motion for partial summary judgment (Docket No. 70) without prejudice to their right to re-file.

3. THCI withdraws its pending cross-motion for partial summary judgment (Docket No. 75) without prejudice to its right to re-file.

**DUANE MORRIS LLP**

  
Michael Lastowski (No. 3892)  
Christopher M. Winter (No. 4163)  
1100 North Market Street, Suite 1200  
Wilmington, Delaware 19801-1246  
Tel.: (302) 657-4900  
Fax: (302) 657-4901

-and-

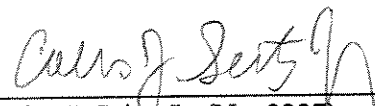
**TROUTMAN SANDERS LLP**

Amos Alter  
The Chrysler Building  
405 Lexington Avenue  
New York, NY 10174  
Tel: (212) 704-6000  
Fax: (212) 704-6288

*Attorneys for Plaintiffs*

Dated: March 30, 2006

**CONNOLLY BOVE LODGE & HUTZ LLP**

  
Collins J. Seitz, Jr. (No. 2237)  
Kevin F. Brady (No. 2248)  
1007 North Orange Street  
Wilmington, DE 19801  
Tel: (302) 658-9141  
Fax: (302) 658-5614

-and-

**PITNEY HARDIN LLP**

David S. Sager  
Paul R. Marino  
P.O. Box 1945  
Morristown, NJ 07962  
Tel: (973) 966-6300  
Fax: (973) 966-1015

*Attorneys for Defendant, THCI Company LLC*

Dated: March 30, 2006

IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2006.

\_\_\_\_\_  
The Honorable Gregory M. Sleet